ET Docket No, 07-257 Comments

I am opposed to Veroscan's Inc. request for waiver of Section 15.247(b) of the Commission's rules which limits the radiated power to 4 watts EIRP in the 902-928 MHz band. Veroscan wishes to operate their product at 25 Watts EIRP and I am against such operation.

Below I have listed the reasons why Veroscan's product should not be allowed to operate at power levels that exceed Section 15.247(b) limitations.

1. We must carefully control the amount of RF energy that products generate. The levels proposed by Veroscan will expose humans to RF energy that exceeds the FCC safety level of 3 mW/cm^2 at 900 MHz. If Veroscan's products are allowed to generate 25 watts, the RF exposure level at 12 inches will be 3.5 mW/cm^2. This level is higher the FCC's
safe exposure level for humans.

2. Veroscan's waiver request will allow their products to generate 8 dB higher RF levels. These higher levels will cause interference to cellular and paging services that typically are mounted on top of hospitals and health clinics. Since Veroscan's products will be used in hospitals, the potential of interference to cellular and paging services
will be high.

3. Veroscan's waiver request will allow their products to generate 8 dB higher RF levels. These higher levels will cause interference to existing vehicle tracking services in the 902 – 928 MHz band.

4. Veroscan's waiver request will allow their products to generate 8 dB higher RF levels. These higher levels may cause interference to the U.S. Government's airborne radio location systems.

5. Veroscan's waiver request will allow their products to generate 8 dB higher RF levels. These higher levels will cause interference to amateur radio repeaters and communications that operate in the 902–928 MHz band.

Additionally, my wife is an operating room scrub nurse with 30 years experience as a nurse. I showed her what information I could find on the use of Veroscan's products and explained to her what the waiver would allow. Her comment to me was that based on her 30 years of being and RN, that they have always been successful in doing a manual account of instruments and other items used in surgery. Should, in the heat of the moment, the count be incorrect, proven, established procedures are in place to identify and recover any items that might be missed. Her opinion is that the request for

the waiver to allow the high power levels are completely unnecessary, and should not be allowed.

My opinion is that Veroscan's requested waiver should be denied and their products should be allowed to operate at the existing levels specified in Section 15.247(b).

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